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Attorneys for Defendant Enby, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

X \_\_\_\_\_ X

BOYAJIAN PRODUCTS, LLC,

Plaintiff,

v.

ENBY LLC,

Defendant.

**Case No. 3:20-CV-1991-HZ**

**DEFENDANT'S SECOND  
MOTION FOR EXTENSION OF  
TIME TO RESPOND TO  
COMPLAINT**

X \_\_\_\_\_ X

**LR 7-1(a) CERTIFICATE**

Counsel for defendant Enby, LLC ("Enby") conferred with counsel for plaintiff Boyajian Products, LLC ("Boyajian") by email regarding this request for an extension of time. Plaintiff consents to this request.

**MOTION**

In accordance with Federal Rule of Civil Procedure 6(b), Enby respectfully moves the Court for an extension of time to respond to Boyajian's complaint up to and including January 15, 2021. Defendant accepted service of the complaint on November 17, 2020. The parties have conferred, and agreed to a response date of January 15, 2021.

Good cause exists for this extension as Enby's *pro hac vice* counsel has only recently been admitted in this matter, and requires some additional time to consider and prepare defendant's initial responsive pleading. Defendant reserves the right to assert all potential defenses and objections to the complaint. This motion is not opposed by Boyajian and not made for purposes of delay.

Dated: January 8, 2021

Respectfully Submitted,

s/ Frederic B. Jennings  
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*Attorneys for Defendant Enby, LLC*

**CERTIFICATE OF SERVICE**

I certify that on January 8, 2021, I filed the above Defendant's Second Motion for Extension of Time to Respond using the Court's ECF system, which will notify and provide a copy to all counsel of record.

DATED: January 8, 2021

/s/Frederic B. Jennings

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